

In the Matter of)
) CC Docket No. 99-200
Numbering Resource Optimization)

³ *Id.*

suggests that NeuStar's claims of confidentiality could interfere with, and have interfered with, the competitive selection of a Pooling Administrator.

To place Telcordia's concerns in perspective, NeuStar emphasizes that its understanding of the technical and operational requirements that must be fulfilled by the Pooling Administrator is a product of its experience serving as the North American Numbering Plan Administrator ("NANPA"). The NANC's recommendation that NeuStar be appointed the Pooling Administrator, which was supported by a wide range of industry participants and regulatory agencies,⁴ was the result of NeuStar's proven numbering administration expertise and efficiency.

Moreover, there is nothing to support Telcordia's suggestion that the IMG has favored NeuStar in preparing the Pooling IMG Thousand Block Pool Administrator Requirements Document ("Requirements Document"). The IMG, as a NANC committee, has no incentive to favor NeuStar. The charge that other parties have not had access to the IMG's "confidential technical requirements document" also makes no sense, given that the Requirements Document has been available on the Commission's web site.⁵ Moreover, the *NRO Order* directs the NANC to propose revisions to the Requirements Document "with the active participation of all interested parties" and states that the Commission will release a Public Notice "seeking comment on the technical requirements for the Pooling Administrator...."⁶

Telcordia's recommended approach to an open bidding process, however, is sound and should be endorsed by all parties. Telcordia proposes that the Commission ensure that the bidding process used to choose the Pooling Administrator is an open and freely competitive one, with complete technical and operational information available to

⁴ See *NRO Order* at ¶¶ 146-47, 149 & n. 342.

⁵ See *id.* at ¶ 146, n. 337.

⁶ *Id.* at ¶ 155.

all potential bidders, and that NeuStar provide complete technical interfacing information needed by the entity that is chosen as the Pooling Administrator. NeuStar fully supports the suggestion that the Request for Proposals (“RFP”) provide all potential bidders all of the technical and operational criteria that they will need to meet in a manner that ensures a level playing field.

In keeping with the requirements of an open competitive process, the Commission should reject Telcordia’s implicit suggestion that NeuStar or any other party to the forthcoming bidding process be deprived of the protection of confidentiality that they otherwise would enjoy or that NeuStar’s claims of confidentiality could somehow affect the content of the RFP.⁷ There is no reason to assume that any bidder’s claims to proprietary information should interfere in any way with an open bidding process. Moreover, just as NeuStar has cooperated in good faith with the NANC during the Pooling Administrator selection process to date, NeuStar will continue to cooperate with the NANC, the rest of the industry and the Commission to ensure an open competitive bidding process, including the provision to the Pooling Administrator of whatever technical interfacing information may be necessary.


Telcordia also requests that the Commission ensure that NeuStar not use its NANPA or Number Portability Administration Center (“NPAC”) status to make any unauthorized *ex parte* presentations related to the pooling administration bidding process. Telcordia also requests that all potential bidders be invited to any conferences held with any potential bidders by Commission staff, the NANC or the NANC IMG prior to submission of bids and that all bidders be accorded comparable opportunities for individual discussions with Commission staff, the NANC or the NANC IMG after submission of their bids. NeuStar vigorously objects to any suggestion that it has been engaging in any improper *ex parte* contacts with the Commission related to number

⁷ See Telcordia Comments at 2.

pooling or any other numbering issue. Telcordia certainly has not pointed to any aspect of NeuStar's dealings with the Commission that raises any such implication. NeuStar has no objection, however, to Telcordia's suggestions as to the conduct of meetings with bidders, as such procedures would help to ensure an open competitive process.

Finally, NeuStar urges that the RFP that is ultimately issued precisely instruct bidders about the exact information that they must provide and the performance levels that will be expected of them. A precisely drafted RFP is essential to ensure interested parties a fair and open competitive bidding process that will achieve the goals set forth in the *NRO Order*.

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Dated: June 20, 2000

CERTIFICATE OF SERVICE

I, James S. Bucholz, do hereby certify that the foregoing **Response To Comments of Telcordia Technologies, Inc.** was served on this 20th day of June, 2000, to the following by first-class mail, postage prepaid, or by hand delivery:

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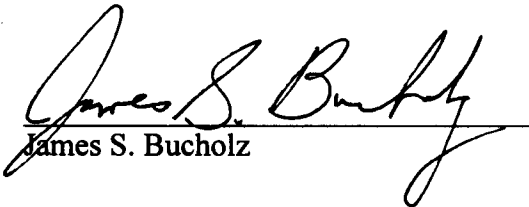
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